

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

JARED RAPP, individually and on behalf
of and all others similarly situated,

Plaintiff,

vs.

GREEN TREE SERVICING, LLC, a
Delaware limited liability company,
GREEN TREE INSURANCE AGENCY,
INC., a Minnesota corporation,

Defendants.

Court File No.: 12-cv-02496 (PJS/FLN)

**PLAINTIFF'S MOTION TO COMPEL
DISCOVERY RESPONSES FROM
DEFENDANTS GREEN TREE
SERVICING, LLC AND GREEN
TREE INSURANCE AGENCY, INC.**

Plaintiff Jared Rapp hereby moves the Court pursuant to Rules 34 and 37 of the Federal Rules of Civil Procedure for an Order compelling discovery responses from Defendants Green Tree Servicing, LLC ("GTS") and Green Tree Insurance Agency, Inc. ("GTI") (collectively referred to as "Green Tree Defendants" or "Green Tree").

This Motion is based upon the Memorandum of Law, Declaration of Hart L. Robinovitch and attached exhibits, and Proposed Order served and filed herewith, together with all the files, records, and proceedings herein.

Respectfully submitted,

ZIMMERMAN REED, PLLP

Dated: August 5, 2013

By: /s/ Hart L. Robinovitch

J. Gordon Rudd, Jr., MN Bar No. 222082
Hart L. Robinovitch, MN Bar No. 240515
14646 N. Kierland Blvd., Ste. 145
Scottsdale, AZ 85254
(480) 348-6400 Telephone
(480) 348-6415 Fax

Caleb LH Marker, CA Bar No. 269721
(Admitted *Pro Hac Vice*)
RIDOUT LYON + OTTOSON, LLP
555 E. Ocean Boulevard, Suite 500
Long Beach, CA 90802
(562) 216-7380 Telephone
(562) 216-7385 Fax

David A. McKay, GA Bar No. 494171
(Admitted *Pro Hac Vice*)
RIDOUT LYON + OTTOSON, LLP
555 North Point Center East, 4th Floor
Alpharetta, GA 30022
(404) 907-1870 Telephone
(404) 907-1869 Fax

Attorneys for Plaintiff